

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

COGNEX CORPORATION,  
Plaintiff,

v.

JEAN CARON,  
Defendant.

CIVIL ACTION NO. 04 12365 JLT

**SECOND AFFIDAVIT OF DIDIER LACROIX**

I, Didier Lacroix, being first duly sworn, do hereby depose and state as follows:

1. Former Cognex employee Jean Caron ("Caron") worked in Cognex's Vision Solutions group during his entire employment with Cognex.
2. As part of Vision Solutions Caron used many of Cognex's products and vision tools in order to perform his function of developing custom software.
3. As a Regional Sales Manager for the Southern Region I was also responsible for the Vision Solution group in my area and, therefore, I know what products Caron worked most closely with and in which products and machine vision software tools his expertise lies.
4. Caron's primary knowledge-base of Cognex products is comprised of what we call "PC Vision". In other words, machine vision software products and tools that rely on a personal computer, or "PC", to operate. Included in the PC Vision category are the Cognex products and tools MVS-8000, VisionPro, CVL (*i.e.*, Cognex Vision Library) and PatMax. Caron used these PC Vision products everyday as part of his Vision Solutions function of developing custom software applications for Cognex's customers.
5. Further, although Caron – and other Cognex France employees – use these PC Vision products everyday, they are almost exclusively developed by Cognex's engineers at its corporate headquarters in Natick, Massachusetts.

6. A vast majority of Cognex's software engineers charged with the responsibility of inventing these machine vision software tools and products are employed by Cognex in Massachusetts.
7. At all times during Caron's employment with Cognex all instructions as to new product releases, whether new products or revisions to current products, were given by the Order Administration Department ("OA") at Cognex's headquarters in Natick. In other words, Cognex employees in Europe only learned of new product releases and were permitted to openly sell and use those products once they were told by OA that the product was "generally available."

Signed under the pains and penalties of perjury this 9th day of December, 2004.

/s/ Didier Lacroix  
Didier Lacroix